To: OPP EFED Managers[OPP_EFED_Managers@epa.gov]

From: Echeverria, Marietta

Sent: Wed 4/26/2017 12:51:01 PM
Subject: FW: Issue Paper on the ESA BEs
ESA Issue Paper industry letters 4-26-17.docx

FYI – this is the issue paper that went forward. Please note that the recommendations could still change pending Wendy's review and that the paper is internal, deliberative. Thanks to those who participated in the discussion yesterday regarding the impact refinements to the BE process could have on the number of NE/NLAA/LAA calls.

From: Keigwin, Richard

Sent: Wednesday, April 26, 2017 6:28 AM

To: Cleland-Hamnett, Wendy <Cleland-Hamnett.Wendy@epa.gov>; Wise, Louise

<Wise.Louise@epa.gov>

Cc: Echeverria, Marietta < Echeverria. Marietta @epa.gov>; Dyner, Mark

<dyner.mark@epa.gov>; Jakob, Avivah < Jakob.Avivah@epa.gov>; Dinkins, Darlene

<Dinkins.Darlene@epa.gov>

Subject: Issue Paper on the ESA BEs

Wendy—

Following up on the discussion during Tuesday's OPP General, here is a draft issue paper that provides background on how we got to this stage, the concerns raised by industry, and a proposed path forward. While we tried to keep it to 2 pages, given the extensive background, we do run over onto a third page. Please let us know if you have any comments and/or how you'd like to proceed in elevating this issue.

--Rick

Rick Keigwin

Acting Director, Office of Pesticide Programs

US Environmental Protection Agency